

GAO

Report to Congressional Committees

December 1991

# 1990 CENSUS

## Limitations in Methods and Procedures to Include the Homeless



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## General Government Division

B-246347

December 30, 1991



The Honorable Herb Kohl, Chairman  
The Honorable Warren Rudman, Ranking Minority Member  
Subcommittee on Government Information and Regulation  
Committee on Governmental Affairs  
United States Senate

The Honorable Thomas C. Sawyer, Chairman  
The Honorable Thomas J. Ridge, Ranking Minority Member  
Subcommittee on Census and Population  
Committee on Post Office and Civil Service  
House of Representatives

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This report responds to section 402 of Public Law 101-645, the Stewart B. McKinney Homeless Assistance Amendments Act of 1990, which required us to assess the methodology and procedures used by the Bureau of the Census in counting the number of homeless persons for the 1990 decennial census. This report focuses on the Bureau's Shelter and Street Night (S-Night) operation, which was the primary effort designed to include selected components of the homeless population in the census. We provided preliminary information on S-Night during a joint hearing of your Subcommittees on May 9, 1991.<sup>1</sup>

## Background

In an effort to include homeless persons in the census and as concern about the homeless grew and became part of the nation's political and social agenda during the 1980s, the Bureau decided that the 1990 census would for the first time include a nationwide program to gather information on the number and characteristics of selected components of the homeless population. The Bureau did S-Night on the night of March 20, 1990, and during the early morning hours of March 21, 1990—10 days before April 1, Census Day—at homeless shelters and selected street and other locations not intended for habitation, including parks, restaurants, movie houses, and transportation terminals.

The Bureau's procedures called for counting and gathering basic demographic data from all persons except those in uniform or engaged in obvious money-making activities other than begging and panhandling. Enumerators were not to ask screening questions or otherwise seek to determine if persons were homeless.

<sup>1</sup>Counting the Homeless: Limitations of 1990 Census Results and Methodology (GAO/T-GGD-91-29, May 9, 1991).

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The Bureau hired approximately 22,600 enumerators and first line supervisors for S-Night and visited about 10,600 shelters and 24,300 street locations. Out of concern for the safety of both enumerators and the homeless, the Bureau instructed enumerators not to go onto rooftops or into cars, dumpsters, or other potentially dangerous spots to search for those who were not visible. The Bureau told enumerators that they could enumerate by observation from their cars as a last resort. The Bureau reported that 228,621 persons were counted nationwide—178,828 in shelters and 49,793 at open locations in the streets.<sup>2</sup>

## Results in Brief

S-Night was not designed to, and did not, provide a complete count of the nation's homeless population. S-Night was designed to count selected components of the homeless—those persons in preidentified shelters and visible at designated street and other locations. Other persons who may have been homeless—for example, homeless persons temporarily living with another family—were counted through other census efforts and were not included in the S-Night counts. The number of persons who might be considered homeless and who were counted through other census efforts cannot be fully identified.

Moreover, the street count results from S-Night do not represent a complete count of the homeless street population. The Bureau recognized at the time it made its decision that its nighttime street count method had two key limitations. First, the hidden homeless—those persons not in shelters or visible on the streets at night—would not be included in the census. The Bureau understood that independent researchers in two cities had found that the hidden homeless can represent up to two-thirds of the nighttime homeless street population. Second, the Bureau did not have procedures to ensure that persons counted on S-Night were homeless and would not also be counted during other census operations. A 1989 Bureau test showed that counting the homeless at daytime service locations (such as soup kitchens), although not perfected, offered promise as an alternative way to address the limitations of a nighttime street count. However, by 1989 it was too late to do additional research and incorporate the method into the 1990 census.

<sup>2</sup>The reported number of persons counted in shelters on S-Night will increase in 1992 when the Bureau releases the counts of persons in shelters for abused women or runaways enumerated on S-Night who reported "no usual home elsewhere." These data were withheld from counts released at the block level because disclosure might compromise confidentiality.

Operational problems further undermined the degree to which the S-Night street count was accurate. For example, the Bureau relied primarily on local governments to identify street locations where the homeless could be found. All but 19 of the nation's approximately 1,300 local government units with populations over 50,000 responded to the Bureau, but overall, 36 percent of all local governments responded. The number of homeless persons missed because most local governments did not participate cannot be determined. Further, in areas where the Bureau did a street count, the accuracy of that count is questionable. For example, about half of the on-site observers in the parts of three cities contracted by the Bureau to assess S-Night operations reported that they did not see an enumerator at designated sites.

## Objective, Scope, and Methodology

The Stewart B. McKinney Homeless Assistance Amendments Act of 1990 (Public Law 101-645, section 402) required us to assess the methodology and procedures used by the Bureau to count the number of homeless persons for the 1990 decennial census.

To meet our objective, we interviewed Bureau staff who designed and implemented the S-Night operation and reviewed planning documents and the results of tests for the 1990 program. We reviewed Bureau documents that described and evaluated efforts to enumerate the homeless in previous decennial censuses. We also reviewed the results of assessments of S-Night done for the Bureau in five cities (New York, Los Angeles, Chicago, Phoenix, and New Orleans) by independent researchers who hired observers to stay at selected street locations during S-Night. Finally, we reviewed preliminary summaries of the results of debriefing questionnaires completed by S-Night enumerators in the five cities where the independent assessments were done and reports from Bureau headquarters officials and staff who monitored S-Night. According to the Bureau, it plans to complete its overall assessment of S-Night in 1992.

To gain a local perspective on S-Night, we interviewed officials identified by the Bureau as S-Night contact points in 20 cities with populations over 50,000 as of April 1991 to obtain their views on S-Night. We judgmentally selected them to include the five cities where the Bureau's independent S-Night assessments were done and then chose other large cities to obtain a geographic representation of the country.

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We did our work from November 1990 through October 1991 at the Bureau of the Census in Suitland, Md., in accordance with generally accepted government auditing standards.

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## Total Number of Homeless Included in 1990 Census Cannot Be Determined

S-Night was designed to count only selected components of the homeless population—those persons staying in preidentified shelters or visible at designated street and other locations where the homeless are found. However, depending on how it is defined, the homeless population can consist of persons in a wide range of situations—from the literally homeless, those without a fixed and regular residence, to those who are precariously housed, such as some persons in spouse abuse centers or those doubled-up with other families in a single unit.<sup>3</sup> As a result, S-Night did not attempt to provide a complete count of the nation's homeless. The number of persons who might be considered homeless who were counted through other census efforts cannot be fully identified in census data.

The Bureau's definition of a shelter for the purposes of S-Night provides an example of how homeless persons might have been included in census totals but not in S-Night results. The Bureau funded a study to assess the completeness of the S-Night list of shelters where the homeless stay. Local homeless experts developed lists of shelters for the Bureau to compare to its own list in a stratified random sample of 44 of the Bureau's 449 district office areas. The local experts identified 1,330 places where homeless persons could be found. Of these, 462 met the Bureau's definition of a shelter for the purposes of S-Night. According to the Bureau, it enumerated more than twice as many shelters as the local experts had identified. However, 868 (about 65 percent) of the locations listed by the local experts as places where homeless persons stay did not meet the Bureau's criteria of a shelter for the purposes of S-Night. Therefore, although these locations where homeless persons stay should have been counted as part of other census operations, the counts would not be included in the S-Night totals.

According to the Bureau, the local experts included places where both persons with a usual residence and the homeless might have stayed (e.g., hotels that were used occasionally, but not regularly, to house homeless people for a night or two). These hotels were primarily in

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<sup>3</sup>In *Homeless Mentally Ill: Problems and Options in Estimating Numbers and Trends* (GAO/PEMD-88-24, Aug. 3, 1988), we provided options for measuring homelessness, such as periodic local area samples. All of these options extend well beyond the boundaries of a decennial census.

rural, suburban, and smaller urban areas. Bureau staff who assessed the shelter component of S-Night concluded that overall the Bureau's list of shelters meeting its definition appeared quite complete. However, they also concluded that the Bureau's "criteria used to identify S-Night shelters do not seem sufficient to cover the range of places sheltering homeless people in less densely settled areas."<sup>4</sup>

## Limitations in S-Night Methodology Affected the Quality of the Street Count

The 1990 S-Night street enumeration represented a significant departure from the approach the Bureau used during the 1980 census. In 1980, the Bureau did a nighttime count at homeless shelters and other facilities and a daytime count—called the Casual Count—after Census Day at places such as bars, pool halls, street locations, parks, and social service centers such as food stamp, welfare, and unemployment offices. This program was designed to reach highly transient individuals with no permanent place of residence who were not counted by regular census procedures in some large cities. The Bureau's management of the 1980 Casual Count was highly decentralized. The Bureau is not certain in how many cities the count was done, and its estimates of the number of persons added to the 1980 census by the Casual Count vary from 13,000 to 23,000.

A 1984 Bureau evaluation recommended that the Bureau retain the basic Casual Count methodology for 1990.<sup>5</sup> However, the study pointed to a number of areas, for example improving and automating procedures to guard against double-counting, in which the Bureau needed to take action to have a more accurate count. The Bureau's only field test of the Casual Count during the 1990 census cycle, done as part of the 1986 census test in Los Angeles, was not successful because the Bureau lost the completed census forms and was, therefore, unable to produce the detailed results needed to evaluate its efforts.

Without resolving all of the issues it identified to improve the Casual Count, the Bureau decided in January 1987 to fundamentally alter its strategy and do a nighttime enumeration of street locations in combination with a shelter count in 1990. The absence of proven screening questions to determine who was homeless and procedures to eliminate

<sup>4</sup>Laurel Schwede and Matt T. Salo, "The Shelter Component of S-Night," paper presented at the Bureau of the Census 1991 Annual Research Conference, March 18, 1991.

<sup>5</sup>1990 Census Committee on Special Enumeration Procedures Final Report, Bureau of the Census, Suitland, Md. (July 1984).

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double-counting were a large part of what caused the Bureau to conclude that a daytime count, as was done in 1980, could not be done in 1990. Although the Bureau had not done a thorough assessment of the nighttime method to determine that it was superior to a daytime count, the Bureau concluded that the time available to test competing design options for the census had run out, and it needed to settle on a method for counting selected components of the homeless in 1990.

In the absence of its own comparative tests, the Bureau's decision to do a nighttime street count was based on its review of attempts by independent experts to measure homelessness in such cities as Nashville, Chicago, and Washington, D.C., and informal discussions with those experts. The Bureau also received input from field staff experienced in the 1980 Casual Count and attended meetings with homeless advocates, service providers, and homeless persons.

The Bureau recognized at the time it made its decision that a nighttime street enumeration suffered from two major methodological limitations. First, a major difficulty with any attempt to count the homeless, particularly at night, is that a portion of the homeless population is hidden. Persons not in shelters may seek safety, privacy, and protection, especially in foul weather, in locations such as abandoned cars and dumpsters—sites that the Bureau considered too dangerous for census enumerators to enter. The fact that the population is hidden makes estimating its size extremely difficult. However, the Bureau identified two studies done in different cities that had estimated that the hidden homeless could comprise up to two-thirds of the street population.<sup>6</sup>

The second major limitation to the Bureau's approach was that it did not design procedures to guard against counting persons who may also be counted during other census operations. Double-counting causes inaccuracies in reported census counts and errors in the demographic data on the homeless. The Bureau's S-Night procedures of counting at designated locations all persons not in uniform or engaged in obvious money-making activity did not eliminate the problem of double-counting. Rather, the procedures assumed that persons counted on S-Night would not be counted during other census operations.

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<sup>6</sup>See Frederic G. Robinson, *Homeless People in the Nation's Capital*, Center for Applied Research and Urban Policy, University of the District of Columbia, Washington, D.C., November 1985, for an example of an attempt to estimate the number of hidden homeless.



The Bureau believed that by counting persons on a single night in shelters and on the streets, it minimized counting persons with a residence who would be counted during other census efforts. Nevertheless, the Bureau acknowledged that S-Night street data cannot properly be said to reflect a count of the homeless but rather a count of persons at preidentified locations where the homeless are believed to be found.

The Bureau tested its nighttime street count procedures during the census dress rehearsal in 1988. A Bureau-commissioned independent report on the dress rehearsal in St. Louis found that the shelter count went well but also confirmed the nighttime street count's problems of missing some of the homeless and counting persons who were not homeless.<sup>7</sup> The report recommended that the Bureau "give very serious consideration to alternative methods and procedures" for doing the street count. Specifically, the researchers suggested that on the basis of their experience and the high percentage of homeless who at least occasionally use services, cross-matching records from service providers could be used in conjunction with informant interviews to count a greater portion of the homeless. However, by 1988 it was already too late to make major design changes for the 1990 census.

### 1989 Test Showed Daytime Count Promising

The Bureau tested a daytime enumeration at facilities that serve homeless persons in parts of Baltimore in June 1989—less than 1 year before S-Night. This test was part of the Bureau's research on alternative methods to enumerate the homeless. It included a shelter and street night count and compared the results to the day count. The test showed that a daytime enumeration at service locations, such as soup kitchens, combined with a nighttime shelter count is successful in counting at least a portion of the hidden homeless population missed when only a nighttime shelter and street count is done.<sup>8</sup> The test also showed that a daytime method can enable the Bureau to gather more detailed demographic information by interviewing persons when they are awake rather than by observing sleeping individuals.

The Bureau's 1989 test, although done on a small scale, showed that a daytime enumeration of persons at social service centers was promising,

<sup>7</sup>George J. McCall, Ronald M. Denowitz, and Michael C. Stein, A Participant Observation Study to Evaluate Procedures for Enumerating the Homeless in the St. Louis Dress Rehearsal, final report for Joint Statistical Agreement 87-22, Bureau of the Census, Suitland, Md. (Dec. 1989).

<sup>8</sup>Pamela C. Campanelli, Matt T. Salo, Laurel Schwede, and Elizabeth Martin, "Research on Enumerating Homeless Persons: Results of a Census Bureau Test of Alternative Methods," paper prepared for the annual meeting of the American Statistical Association, Anaheim, California, August 5, 1990.



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although additional research was needed—for example, to refine screening questions to determine which persons were homeless and to match persons potentially counted at different locations to guard against double-counting. The Bureau concluded that there was not sufficient time before S-Night to resolve these issues.

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## Operational Problems Contributed to Incomplete S-Night Street Count

In addition to methodological limitations, operational problems further undermined the accuracy of the S-Night street counts. Two major factors limited the reliability of the S-Night street count: (1) the quality of address lists varied across the nation and (2) the Bureau experienced implementation problems on S-Night.

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## Local Governments Had Key S-Night Role

The active participation of local governments in helping to develop the S-Night address list was important to determining the relative success of S-Night in any given area. The Bureau compiled an initial list of shelters for homeless persons from national lists available from several sources, such as the Department of Housing and Urban Development and the Salvation Army. The Bureau recognized that input from local governments was important to ensure that the national lists were complete and current. In addition, there were no national lists of street sites, abandoned buildings, and other open public locations not intended for habitation where homeless persons congregate. Therefore, the Bureau contacted the nation's 39,000 local governments to obtain names and locations of possible S-Night sites.

Overall 36 percent (about 14,200) of the local government units responded.<sup>9</sup> All but 19 of the 1,300 cities with populations greater than 50,000 responded to the Bureau. In the 19 cities with populations over 50,000 that did not respond with S-Night locations, the Bureau's district office employees, working with knowledgeable local people, prepared lists of street locations to visit on S-Night. A shelter count was done in communities that did not respond only if the Bureau had identified a shelter as part of its search of national lists. A street count generally was not done in communities with a population of less than 50,000 that

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<sup>9</sup>The Bureau is determining the portion of the population residing in areas which participated in S-Night. Since all communities over 50,000 were included in S-Night, the percentage of the population covered will likely be larger than indicated by the level of local government participation. Results are not scheduled to be released until 1992.

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did not identify locations for the Bureau. The number of homeless persons missed because local governments did not participate cannot be determined.

Even when the local government did participate, the adequacy of the street addresses they provided appeared to have been highly uneven. S-Night enumerators and Bureau officials who observed S-Night reported instances of going to assigned sites where homeless persons may have congregated during the day but were unoccupied at night—for example, a restaurant that was not open all night. While local officials we interviewed were confident that they knew shelters where the homeless could be found, they expressed less confidence that all street sites where the homeless stay were identified.

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### Shelter Count Went Well, but the Bureau Encountered Problems With the Street Count

Similar to the 1988 dress rehearsal, the 1990 shelter count appears to have gone quite well. S-Night enumerators were denied access to shelters in only a few instances. In these cases, the Bureau enumerated the shelter the following morning as persons left the buildings or later as part of other census efforts. S-Night enumerators also generally had access to shelter occupancy registers and staff to verify the number of persons to be counted at each facility.

On the other hand, the Bureau has acknowledged that the street portion of S-Night suffered from a number of operational limitations. These limitations with the street count were consistently identified by Bureau employees, such as census enumerators and headquarters staff who monitored S-Night, and independent researchers,<sup>10</sup> who hired observers to stay at designated S-Night street locations and report on whether or not they believed they were counted. For example, observers and Bureau staff identified instances in which homeless persons appear to have been missed on S-Night.

The independent researchers' on-site observers reported what a Bureau staff person involved in designing and managing S-Night characterized as a "disturbingly large" number of instances of the observers not being interviewed for basic demographic data or of not seeing enumerators. Reports that enumerators were not seen are significant because the on-site observers were assigned to be in open view at street locations identified for enumeration by the Bureau. Table 1 shows that about half of

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<sup>10</sup>Appendix I contains a list of the Bureau-funded independent assessments of S-Night.

the observation teams in six of the Bureau's district offices in three cities reported that they did not see an enumerator during S-Night.

**Table 1: Observation Sites Where No Enumerators Were Seen**

<b>Cities</b>	<b>Number of observation sites</b>	<b>Number of sites where no enumerators were seen</b>
Los Angeles	30	14
New York	41	18
Phoenix	28	14
<b>Total</b>	<b>99</b>	<b>46</b>

Note: Researchers from Chicago and New Orleans did not report this information.

Source: Independent researchers' assessment reports on S-Night. See appendix I for complete references.

The Bureau's S-Night procedures allowed enumerators to count a person by observation without doing an interview if the person was asleep or if the enumerator felt the situation was unsafe. Thus, it is possible that the homeless and observers might have been counted without their knowledge. In addition, according to the Bureau, in a few cases on-site observers and census enumerators might not have gone to the same locations. The Bureau currently is reviewing the S-Night street counts from locations where observers reported not seeing an enumerator to determine if enumerators reported counting persons at those locations. Still, the accuracy of a count is suspect when so many observers, watching for the enumerators, reported not even seeing an enumerator. On the basis of his monitoring of S-Night operations in Los Angeles, the Bureau's Associate Director for Demographic Programs concluded that many homeless on the streets were missed and others were counted at least twice.

The results of the researchers' discussions with homeless persons after S-Night to determine if they had been enumerated, although limited in scope, reinforced concerns that the street count was not accurate. In New York, 4 of 18 homeless persons said they had been interviewed for demographic data. In Phoenix, all 12 of those who had stayed in a shelter on S-Night said they had been interviewed or counted, but only 2 of 10 homeless persons who had spent the night on the street said they had been. In Los Angeles, 8 of 50 homeless persons reported actually being interviewed. In Chicago, 5 of 18 homeless persons said they had been interviewed, and 4 of them had stayed in a shelter.

The difficulties S-Night enumerators experienced in finding their assigned locations is one factor that may have hampered S-Night operations. The preliminary results of questionnaires completed by enumerators in the five cities where the independent evaluations were done show that about 90 percent of S-Night enumerators reported that they had problems finding their assigned locations. According to the Bureau, many of the street locations identified by the local governments were ambiguous. In addition, almost two-thirds of the enumerators in the five cities reported that their assignments were in areas that were not well known to them.

It is not known how many enumerators eventually found their assigned locations. Nevertheless, a Bureau staff person who helped design the S-Night program subsequently said that it would have been useful if Bureau procedures had included visits to street and shelter sites the day before S-Night. In 1980, the Bureau visited locations before the Casual Count to verify its address list and determine the best time for enumeration.

In addition to difficulty locating their assigned areas, enumerators reported other problems that may have compromised the quality of the count. Sixty-eight percent of the enumerators responding to the questionnaire indicated they experienced problems that made their jobs difficult. Among the specific problems identified were potentially dangerous or threatening situations and uncooperative shelter employees or homeless persons. Bureau headquarters officials and staff who observed the S-Night operation also reported instances of poor organization and coordination of assignments and of enumerators failing to follow S-Night procedures, such as improperly asking persons if they were homeless. Finally, the Bureau believes that the unusually cold, wet weather on S-Night in many parts of the country and the presence of media caused some homeless to move into more hidden locations where they might have been missed.

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## Conclusions

S-Night results cannot be used to construct a count of the nation's homeless population at any level of geography because S-Night was not designed to capture all of the nation's homeless population. In addition, the chosen method of enumerating selected shelter and street locations at night resulted in an unknown number of the hidden homeless being missed and a lack of assurance that those counted were homeless and would not also be counted during other census operations. These methodological limitations, combined with the operational problems the

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Bureau experienced with the street count, resulted in S-Night street data that have limited value in meeting needs for information on the number of homeless and their characteristics.

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## Agency Comments and Our Evaluation

The Bureau provided comments on a draft of this report. The Bureau noted that it has always acknowledged that it would not be able to count the entire homeless population, particularly given that some portion is hidden. The Bureau's goal was to ensure that coverage of the decennial census would be as complete as possible, not to identify and count all of the homeless population. The Bureau said that S-Night was successful given the inherent difficulties with this type of operation. It said that while the shelter count was complete, the street counts should be used with discretion because of limitations with those data.

The Bureau said that in planning for S-Night, it consulted with federal agencies and researchers who had done studies of homelessness in local areas. The Bureau chose the method that it considered best given the research available at the time but recognized that many issues were left unresolved. The Bureau has undertaken its own research and is working with other federal agencies and researchers to develop a federal survey on homelessness.

A draft of this report noted that the Bureau reviewed the work of experts who had experience in counting the homeless at the local level when deciding to do a nighttime street count. We have modified the report to more fully discuss the Bureau's planning efforts, its decision to abandon the planned Casual Count and do a nighttime count, and the limitations that it recognized it would confront with a nighttime street count. The key point is that the Bureau did not do a thorough assessment of the nighttime method to determine that it was superior to a daytime count like the Casual Count.

The draft also discussed the Bureau's June 1989 test of a daytime count as an alternative or supplement to a nighttime street count. The test showed that although additional research is needed, a daytime count offers a promising way of overcoming the major limitations associated with a nighttime count. We agree with the Bureau that the results of its research should prove valuable in planning the 2000 census. Finally, we believe that the interagency effort mentioned in the Bureau's letter to develop a survey of the homeless is an important undertaking that could yield critical information on the extent and nature of homelessness in America.

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We have included the Bureau's letter as appendix II of this report. We have not included the Bureau's detailed technical comments on the report. However, we made changes to this report where appropriate as a result of those technical comments.

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We are also sending copies of this report to other appropriate congressional committees, the Secretary of Commerce, the Director of the Bureau of the Census, and the Director of the Office of Management and Budget. Copies will be made available to other interested parties upon request.

The major contributors to this report are listed in appendix III. If you have any questions concerning this report, please contact me on (202) 275-8676.

A handwritten signature in black ink, reading "L. Nye Stevens". The signature is written in a cursive, flowing style.

L. Nye Stevens  
Director, Government Business  
Operations Issues

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# Bureau-Funded Independent Assessments of S-Night

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Cousineau, Michael R. and Thomas W. Ward. Assessment of S-Night 1990: An Evaluation of the S-Night Enumeration of the Homeless in Los Angeles. Final report for Joint Statistical Agreement 90-17, Bureau of the Census, Suitland, Md. (April 9, 1991).

Edin, Kathryn. Assessment of S-Night 1990. Final Report for Joint Statistical Agreement 90-16, Bureau of the Census, Suitland, Md. (May 1990).

Hopper, Kim. Assessment of S-Night 1990: Monitoring and Evaluating the 1990 S-Night Count in New York City. Final report for Joint Statistical Agreement 90-18, Bureau of the Census, Suitland, Md. (May 1991).

Stark, Louisa R., Henrietta Catalan, Donna Helton, and Marilyn Perez. Assessment of S-Night 1990: An Assessment of the 1990 Enumeration of Selected Components of Homeless Population of Phoenix. Final report for Joint Statistical Agreement 90-15, Bureau of the Census, Suitland, Md. (May 7, 1991).

Wright, James D. and Joel A. Devine. Assessment of S-Night 1990: Toward Census 2000: Some Lessons Learned from the 1990 Shelter and Street Night (S-Night) Enumeration of the Homeless. Final Report for Joint Statistical Agreement 90-12, Bureau of the Census, Suitland, Md. (May 1990).

# Comments From the Bureau of the Census



**UNITED STATES DEPARTMENT OF COMMERCE**  
**Bureau of the Census**  
Washington, D.C. 20233  
OFFICE OF THE DIRECTOR

NOV 20 1991

Mr. Richard L. Fogel  
Assistant Comptroller General  
General Accounting Office  
Washington, D.C. 20548

Dear Mr. Fogel:

Thank you for the opportunity to review the draft report, "1990 Census: Limitations in Methods and Procedures to Include the Homeless." We have enclosed detailed technical comments to the draft.

The Census Bureau understands that counting the homeless is a serious issue for the Nation. We have always acknowledged that we would not be able to count the entire homeless population, particularly given that some portion is hidden. Additionally, there was no agreed-upon definition of homelessness at the time our plans were being developed. We designed S-Night to enumerate people in selected locations where homeless persons are found. It was an operation designed to count people who would not have been counted elsewhere. The goal was to ensure that coverage of the decennial census would be as complete as possible, not to identify and count all of the homeless population.

We believe that we accomplished what we set out to do and that S-Night was successful given the inherent difficulties in this type of operation. The shelter enumeration was complete and provides information about those persons found in the shelters on S-Night. Because of their limitations, we acknowledge street counts should be used with discretion. In our technical documentation of the data, we have explicitly stated the limitations of the data so that users can make knowledgeable decisions about how and when it is appropriate to use the S-Night counts.

In planning for S-Night, we consulted with Federal agencies and researchers who had done studies of homelessness in local areas. We chose the method that we considered best given the research available at the time. The 1990 plans were extensively, openly, and publicly discussed for some time leading up to S-Night.

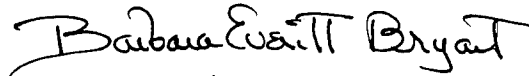
At the time we had to make decisions about 1990 operations, we recognized that there were many issues left to be resolved. We followed research being done and undertook research ourselves. Even though the results could not have been ready in time to use them for 1990, we are using the results to help us understand the data from 1990 and to prepare for the year 2000.

Mr. Richard L. Fogel

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We understand the crucial need for information on the homeless population. Even now we are already working with other Federal agencies and researchers to develop a Federal survey on homelessness. This includes development of definitions that will improve the usefulness of the data to Federal agencies and provide information for national policy decisions about the homeless population.

Sincerely,

A handwritten signature in cursive script that reads "Barbara Everitt Bryant".

Barbara Everitt Bryant  
Director  
Bureau of the Census

Enclosure

# Major Contributors to This Report

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General Government  
Division, Washington,  
D.C.

William M. Hunt, Assistant Director, Government Information and Statistics Issues  
Warren Smith, Evaluator-in-Charge  
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